

October 12, 1998

Mr. Fred Maia, W5YI  
Chairman, NCVEC Rules Committee  
W5YI Group  
P.O. Box 565101  
Dallas, TX 75356

Dear Fred:

You asked that I write to provide Master Publishing's thoughts and concerns regarding the FCC's Notice of Proposed Rulemaking to restructure Amateur service licensing from the perspective of a publisher serving the ham radio community.

**Background:**

Master Publishing is one of the leading providers of study guides for FCC Amateur Radio Licensing. MPI publishes four books and one set of Morse code audio tapes authored by Gordon West, WB6NOA:

1. *Technician No-Code Plus*, for Novice, Technician, and Technician-Plus licenses, contains the Element 2 and Element 3A question pools.
2. *General Class*, for the General Class License, contains the Element 3B question pool.
3. *Advanced Class*, for the Advanced Class License, contains the Element 4A question pool.
4. *Extra Class*, for the Extra Class License, contains the Element 4B question pool.
5. *Learning Morse Code*, is a set of four audio tapes recorded by Mr. West designed to teach applicants the code for the Element 1A 5-wpm and Element 1B 13-wpm Morse code tests.

MPI has been publishing these books and audio tapes for more than 15 years. These publications are sold through 6,500 Radio Shack stores nationwide, all major ham radio dealers, as well as through the W5YI Group. While hard numbers are difficult to establish, MPI estimates that well over half of all individuals who take a licensing examination use its

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publications to study for their licensing examinations. This estimate is based on the number of examinations administered by VEs and the confidential sales records of MPI.

MPI's goal in publishing Mr. West's books goes beyond the profit motive. Our firm has a demonstrated commitment to working with the ham radio community to support its continuation and renew its growth. Our founders are both electrical engineers, one of whom serves as a volunteer editor/proofreader for the NCVEC Question Pool Committee.

Recent trends in amateur radio testing and licensing indicate a hobby in decline, as has been well documented by the FCC, the W5YI Group, the ARRL, and others.

### **Summary of MPI Comments on FCCs NPRM**

It is with this background that MPI makes the following comments on the FCC's Notice of Proposed Rule Making regarding changes to the Amateur Radio Licensing structure. (Please note that MPI will file these comments directly with the FCC via e-mail.)

#### ***Number of License Classes:***

In MPI's opinion, three classes of license would be best – Technician No-Code (entry level); General (intermediate), and Advanced/Extra (highest). From a publishing perspective, if Advanced and Extra are not combined, then the two question pools should expire simultaneously, allowing publishers the opportunity to gain some efficiency by publishing one study guide for the two classes.

#### ***Morse Code:***

Morse code appears to be a major hurdle for those interested in upgrading beyond Technician Class. Recognizing advances in technology, the FCC no longer requires the code for maritime distress and safety communications. While the ITU requires code in the Amateur service, it appears that this requirement may end in 2001. Therefore, it is MPI's opinion that one code speed should be sufficient for both General and Advanced/Extra, since this would meet international treaty requirements. MPI suggests 5 wpm. If certain amateurs wish to operate Morse code at higher speeds by all means allow them to, but the code should not be used to restrict access to high license class privileges.

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### ***Assignment of Spectrum:***

In addition to the Question Pools, each of MPI's four books contains information on spectrum privileges and band plans. It seems likely that spectrum will be reassigned based on the revised licensing structure and Morse code requirements adopted by the FCC. While MPI has no comment on how best to reassign spectrum privileges, we do wish to note that each of our books will have to be revised to reflect these anticipated changes.

### **Revision of Question Pools:**

Along with revision of the license structure, the written examination Question Pools also will need revision. In the past, there has been one Question Pool for each class of license. These pools expire every 4 years, which provides publishers like MPI with a predictable timetable for revision and publication of new editions of its books. This predictable calendar has been *very important* to MPI's ability to achieving economies-of-scale by producing large quantities of books, which helps to keep retail prices relatively low. MPI feels it is imperative that this type of revision schedule be maintained in the future.

Thus, the *timing* of the implementation of the revised licensing structure, spectrum reallocation, and new question pools is of critical importance to MPI and its principal customers – Radio Shack, The W5YI Group, Ham Radio Outlet, and other retailers of our books and tapes.

### ***Current Book Stocks***

Based on sales history and the current stocks of books on-hand in MPI's warehouse, in Radio Shack's warehouse and retail stores, and distributed by W5YI, we estimate that – if nothing were changed by the FCC – current stocks will be depleted as follows:

1. *Technician No-Code Plus* will sell out in late summer 1999.
2. *General Class* will sell out in spring, 2002.
3. *Advanced Class* will sell out in spring, 1999.
4. *Extra Class* will sell out in spring, 2000.

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The revised General Class question pool was released in December, 1997, became effective July 1, 1998, and our revised book was published in spring, 1998. Both Radio Shack and The W5YI Group purchased stocks of this book estimated to last 4 years based on past demand and on the NCVEC-QPC schedule.

The FCC's NPRM, the ARRL proposal, the NCVEC proposal, and many of the other comments that I have seen call for an "easy upgrade" of Novice and Technician-Plus licensees to General Class by reducing the Morse code requirement, giving these licensees credit for their 5-wpm code proficiency, and allowing them to upgrade by taking the now-current Element 3B written examination. If this part of the proposal is adopted, without major changes to the Element 3B question pool, then MPI believes demand for the current *General Class* book will increase and current supplies of the book would sell out in perhaps 18 to 24 months.

***Time Required to Publish:***

The following comments do not take into consideration the amount of time that the NCVEC Question Pool Committee will need to make its revisions.

Currently, it takes MPI about 5 to 6 months to revise a book once the revised question pool is released into the public domain. The publishing process/timetable is as follows:

- A. The author, Gordon West, obtains a copy of the new pool and edits the existing book based on the new pool. He identifies changed question numbers, edits answer explanations for revised questions, and writes explanations for the answers to new questions. This step requires about 4 to 6 weeks.
- B. Once MPI receives the author's copy, we begin typesetting and production of the book. Initial typesetting requires about 4 weeks.
- C. Review of page galleys and copy provided by our other editors and consultants takes yet another 4 weeks.
- D. Final corrections to the book, preparation of film and plates for printing, review of the printer's dylux proof, and actual printing of the books requires from 6 to 8 weeks.

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If the Technician Class remains the entry-level license, and if the existing Element 2 and Element 3A Question Pools are revised and combined to be used for the new pool, MPI should be able to respond relatively quickly to these changes – about 6 months after release of the revised question pools by the NCVEC Question Pool Committee.

If the General Class remains the intermediate level license, and if the existing Element 3B Question Pool is revised for this written examination, then MPI again would be able to respond relatively quickly to the revisions.

Finally, if the Advanced and Extra classes are combined, and the existing Element 4A and Element 4B question pools are combined, we again would be able to respond relatively quickly.

#### **Proposed Timetable for Question Pool Revisions:**

Based on the foregoing, and with the understanding that:

- A. the FCC's goal is to simplify its licensing structure, streamline its operation, and eliminate unnecessary work for itself and the VECs; and
- B. the goal of the ARRL, MPI, and many, many others – including the FCC – is to breathe new life into the Amateur Radio hobby;

MPI suggests the following *timetable for implementation* of a plan for three classes of license:

1. Reduce the Morse code requirement for all classes of license to 5-wpm, effective immediately.
2. Allow Novice and Technician Plus licensees to upgrade to General Class by taking the now-current Element 3B written examination, effective immediately.
3. Allow current General Class licensees to upgrade to Advanced, and current Advanced Class licensees to upgrade to Extra, by taking the now-current Element 4A and Element 4B written examinations, respectively. Extend the expiration date of these two pools to June 30, 2001. Revise and combine the Element 4A and 4B question pools into one new Pool to become effective July 1, 2001.

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4. Revise and combine the Element 2 and Element 3A question pools into a new Pool to become effective July 1, 2000. In the meantime, continue to use these 2 pools as-is and eliminate Novice Class questions that no longer apply based on the new FCC license structure and rules.
5. Revise the Element 3B question pool to become effective July 1, 2002 (which would maintain the current schedule).
6. Put the three new question pools on a 3-year revision cycle.
7. Provide the Volunteer Examiners with a small pamphlet that can be handed out to those taking license exams outlining the new spectrum privileges and any other pertinent changes.

I hope this letter puts into perspective the time required to develop and publish study materials for the FCC Amateur Radio Question Pools. I believe that the proposed timetable takes into account the need of all publishers, not solely MPI, to sell-down current book stocks; the time required by the Question Pool Committee to revise the existing pools into a new format for three classes of licenses; and takes advantage of using existing study materials until new question pools can be developed and approved.

I welcome your comments to MPI's proposals. Obviously, Master Publishing is one of many organizations with a vested interest in the future of our Amateur Radio hobby. MPI intends to continue its role serving this community.

Sincerely,

Peter F. Trotter, KB9SMG  
Vice President